

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
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DATE FILED: 23 NOV 2010

GURPREET KAUR,

Plaintiff,

v.

THE BANK OF TOKYO-MITSUBISHI
UFJ, LTD.,

Defendant.

Civil Action No.: 10-CV-3774 (PAC)

ORDER

This matter having come before the court by joint application by the parties, through written correspondence of Plaintiff's counsel, and good cause having been shown,

IT IS HEREBY ORDERED on this 22nd day of November, 2010 that,

1. Fact discovery, including the deadline to complete fact depositions is extended by 60 days to March 7, 2011.

2. Expert discovery is extended by 60 days to April 19, 2011.

3. Parties to meet to confer on schedule for expert disclosures no later than March 8, 2011.

4. All counsel to meet face-to-face to discuss settlement no later than March 15, 2011.

5. Date recommended by counsel for alternate dispute resolution to be on or about March 22, 2011.

6. *The next conference in this matter will be held on 12-7, 2010 at 4:00 pm*

Paul A. Crotty
Hon Paul. A. Crotty, USDJ

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November 23, 2010

VIA FACSIMILE

Hon. Paul. A. Crotty, USDJ
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: Gurpreet Kaur v. The Bank of Tokyo-Mitsubishi UFJ, Ltd.
Docket No.: 10-CV-3774 – Request for Discovery Extension

Dear Judge Crotty:

This office represents Plaintiff Gurpreet Kaur in the above matter. Please consider this a joint request by the parties to extend the discovery deadline from January 6, 2011 by 60 days to March 6, 2011. (Expert discovery will likewise be moved from February 9, 2011 to April 9, 2011.) This is the first discovery extension request in this matter.

The parties have been diligent in conducting discovery in this matter and have exchanged their written discovery responses. However, due to scheduling difficulties, particularly an overloaded schedule on my part, we have not yet had the opportunity to schedule and conduct depositions. Likewise, it would be difficult if not impossible for the parties to conclude depositions in December because I will be starting a 3-4 week trial on December 6, 2010 in the matter of Nasarimham Kethey and Raju Mathai v. University of Medicine and Dentistry of New Jersey, Lionel Zucker, M.D., and Stephen Baker, M.D., Docket No. ESX-L-9997-06 in the Superior Court of New Jersey. Mr. Kesselman will be out of the office on vacation for part of January.

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The parties are confident, however, that we can conclude all fact depositions and all fact discovery by March 7, 2011, and the completion of all expert discovery by April 19, 2011.

The parties were going to make this request to Your Honor during the case management conference that was previously scheduled on November 17, 2010, but this conference was adjourned to December 7, 2010 due to Your Honor's trial schedule.

I enclose a form of Order if this discovery extension request meets with your approval.

Respectfully yours,

A handwritten signature in black ink, appearing to be 'DZ' followed by a vertical line and the number '151'.

David Zatuchni, Esq.

Cc: Dov Kesselman, Esq. (via facsimile)